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ATTORNEY FOR WASHOE COUNTY
DEFENDANTS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

DREW RIBAR,

Plaintiff,

Case No. 3:24-CV-00526-ART-CSD

vs.

WASHOE COUNTY, NEVADA; WASHOE
COUNTY LIBRARY SYSTEM; BUILD OUR
CENTER, INC.; JEFF SCOTT; STACY
MCKENZIE; JONNICA BOWEN; LIBRARY
EMPLOYEE DOE #1; JENNIFER COLE;
DEPUTY C. ROTHKIN (BADGE #5696);
DEPUTY R. SAPIDA (BADGE #4663; SGT.
GEORGE GOMEZ (BADGE #4066); AND
JOHN/JANE DOES 1+10,

DEFENDANTS' JOINT MOTION
REQUESTING CASE MANAGEMENT
CONFERENCE

Defendants.\

Defendants Washoe County and Defendant Build Our Center, by and through counsel,
hereby respectfully a Case Management Conference be held in this manner. This Motion is based
on the following Memorandum of Points and Authorities.

MEMORANDUM OF POINTS AND AUTHORITIES

On December 18, 2024, this Court set a Case Management Conference for January 23,
2025; however, after Plaintiff and Washoe County Defendants filed a Proposed Stipulated

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1 Discovery Plan and Scheduling Order on December 23, 2024, the Court vacated the conference.
2 (ECF No. 32). On December 27, 2024, Defendant Build Our Center, Inc. appeared in this action.

3 On January 3, 2025, the parties held a conference of the parties pursuant to FRCP 26(f)
4 and based on the discussion of the parties it became clear to the Defendants' counsel that in light
5 of the complexities of the underlying issues, that a pretrial conference pursuant to FRCP 16(a)
6 would be helpful to expedite disposition of this action, establish early and continuing control of
7 the case, and discourage wasteful pretrial activities.

8 Defendants' counsels believe that a Case Management Conference will help clarify the
9 issues and limits of discovery in this matter and facilitate potential early resolution or potential
10 settlement.¹ Additionally, the parties need to discuss potential protective orders and other
11 matters regarding potential confidentiality with the Court.

12 Dated this 7th day of January, 2025.

13 MICHAEL W. LARGE
14 Deputy District Attorney
15 /s/ Michael W. Large
Attorney for Washoe County
Defendant

16 ALISON KERTIS
17 Counsel for Defendant Build Our Center, Inc.
18 /s/ Alison Kertis

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¹ A proposed stipulation to conduct a Case Management Conference was circulated to all the parties; however, no response was ever received from Plaintiff.

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the Office of the District Attorney of Washoe County, over the age of 21 years and not a party to nor interested in the within action. I certify that on this date, I deposited for mailing in the U.S. Mails, with postage fully prepaid, a true and correct copy of the foregoing document in an envelope addressed to the following:

DREW RIBAR
3480 PERSHING LANE
WASHOE VALLEY. NV 89704

Dated this 7th day of January, 2025.

/s/ S. Haldeman

S. Haldeman